Case 1:21-cv-09916-JPO Document 32-3 Filed 04/12/23 Page 1 of 20



LaszloLaw

2595 Canyon Blvd. Suite 210 Boulder, CO 80302

> Phone: 303-926-0410 Tax ID: 26-0118073

Invoice submitted to:

Invoice # 13486

EXTRACT LABS, INC 1399 Horizon Avenue

Lafayette, CO 80026,USA

Invoice Date: 01/01/22 Terms: COD Services Through: 12/31/21

Case 1:21-cv-09916-JPO Document 32-3 Filed 04/12/23 Page 2 of 20

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
In Reference	e To:	TAVAREZ v. EXTR.	ACT (Professional Services)			
12/07/21	VV	Review	Review PACER, ICCES for ADA lawsuit, contacting Plaintiff's counsel re waiver, review of class action lawsuit	0.80	325.00	\$260.00
12/08/21	VV	Review	Received communication re waiver of service, pulled form, sent to counsel	0.10	325.00	\$32.50
12/10/21	VV	Correspondence	Received communication from counsel for Plaintiff Tavarez - refusal to allow us to waive service	0.10	325.00	\$32.50
12/21/21	VV	Review	Review case in Pacer for proof of service, calendar deadline for responsive pleading	0.10	325.00	\$32.50

FINANCE CHG. APPLIED AFTER 60 DAYS AT 1.6% MONTHLY

Page: 2 of 3

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Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
					Hours	1.10
					Labor:	\$357.50
				Invoice .	Amount:	\$357.50



Tax ID: 26-0118073

Invoice submitted to:

Invoice # 13525

EXTRACT LABS, INC 1399 Horizon Avenue Lafayette, CO 80026,USA

Invoice Date: 02/01/22 Terms: COD Services Through: 02/01/22

Date	Ву	Type	Service Summary	Hours/Qty	Rate	Amount
In Referen	се То:	TAVAREZ v. I	EXTRACT (Professional Services)			
01/03/22	VV	Review	Review local rules regarding Motion to Dismiss	0.60	325.00	\$195.00

Case 1:21-cv-09916-JPO Document 32-3 Filed 04/12/23 Page 5 of 20

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
01/06/22	VV	Review	Obtaining Cert of Good Standing from Illinois and Colorado for pro hac vice certification	1.00	325.00	\$325.00
01/06/22	VV	Draft	Drafting Motion to Dismiss Class Action Complaint	0.20	325.00	\$65.00
01/06/22	VV	Research	Review of file in preparation for Motion to Dismiss: Complaint, similar case with similar issues for MTD	1.20	325.00	\$390.00
01/07/22	VV	Draft	Drafting Motion to Dismiss - Intro and Statement of Facts	3.00	325.00	\$975.00
01/07/22	VV	Draft	Drafting Motion to Dismiss - Legal Argument	2.70	325.00	\$877.50
01/07/22	MJL	Draft	Email with counsel re: demand and motion to dismiss (.2)Draft PHV papers for USDC SDNY (1)Emails with client re declaration (.2)	1.40	375.00	\$525.00
01/07/22	VV	Review	Review of Court Order on Ramon Jaquez v. Aqua Carpatica USA and incorporated into brief	0.60	325.00	\$195.00
01/08/22	VV	Draft	Drafting Motion to Dismiss - Legal Argument	1.60	325.00	\$520.00
01/10/22	VV	Draft	Drafting Legal Argument to Motion to Dismiss	2.00	325.00	\$650.00
01/10/22	VV	Draft	Drafting Client Declaration for Mtn to Dismiss	1.40	325.00	\$455.00
01/10/22	VV	Draft	Draft Motion for Pro Hac Vice	0.90	325.00	\$292.50
01/10/22	VV	Phone Call	Preparation for and conducting telephone call with client, Grant Rogers	0.60	325.00	\$195.00
01/11/22	VV	Correspondence	Email to chambers with copies of Motion for PHV	0.20	325.00	\$65.00
01/11/22	VV	Draft	Finalizing and filing Motion for Pro Hac Vice	0.40	325.00	\$130.00
01/12/22	VV	Draft	Drafting Legal Argument in Mtn to Dismiss	0.70	325.00	\$227.50
01/12/22	VV	Review	Review correspondence and files sent by client Grant Rogers regarding remediation and email regarding additional needs for compliance and declaration	0.50	325.00	\$162.50
01/13/22	VV	Review	Review of email from client and response regarding remediation of website	0.20	325.00	\$65.00
01/13/22	VV	Draft	Revising Motion to Dismiss	2.40	325.00	\$780.00
01/13/22	VV	Draft	Revisions to Declaration and submitted to client	1.90	325.00	\$617.50
01/13/22	VV	Draft	Draft Proposed Order	0.40	325.00	\$130.00
01/14/22	VV	Draft	Drafting Unopposed Motion for Extension of Time to File Responsive Pleading, review of Judge's practice standards as well as local rules	1.00	325.00	\$325.00
01/14/22	VV	Review	Received and reviewed order from court regarding proof of service	0.10	325.00	\$32.50

FINANCE CHG. APPLIED AFTER 60 DAYS AT 1.6% MONTHLY

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Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
01/14/22	VV	Correspondence	email to counsel regarding motion for extension due to court not ruling on MPHV	0.10	325.00	\$32.50
01/17/22	MJL	Correspondence	Email with Plaintiff's counsel re: Amended complaint	0.10	375.00	\$37.50
01/19/22	VV	Correspondence	Review of update from client on systems and compliance, final review of Declaration, email to client with Declaration and strategy update	0.40	325.00	\$130.00
01/19/22	VV	Phone Call	Call to opposing counsel regarding amended complaint and waiver of service/motion to dismiss	0.10	325.00	\$32.50
01/19/22	VV	Review	Review client updates to dropbox documents/reports, review signed declaration and answered questions regarding	0.20	325.00	\$65.00
01/19/22	VV	Draft	Revising Stipulated Motion and Letter to court for leave to file Motion to Dismiss	0.70	325.00	\$227.50
01/21/22	VV	Draft	Drafting response to Plaintiff's email with summary of arguments in motion to dismiss	0.30	325.00	\$97.50
01/21/22	VV	Draft	Revisions to Memorandum of Law on Motion to Dismiss in light of email communications with counsel	0.70	325.00	\$227.50
01/24/22	VV	Correspondence	email to opposing counsel regarding filing of amended complaint and deadline for responsive pleading	0.20	325.00	\$65.00
01/24/22	MJL	Correspondence	Discussion with Plaintiff's counsel re extension / amended complaint.	0.10	375.00	\$37.50
In Reference	e To:	ΓAVAREZ v. EXTR	ACT (Expenses)			
01/06/22	VV	Filing Fee	CO Supreme Court - Certificate of Good Standing	1.00	16.00	\$16.00
01/06/22	VV	Postage	UPS Next Day Delivery- Supreme Court	1.00	81.28	\$81.28
01/11/22	VV	Filing Fee	Motion for Pro Hac Vice in NY Southern District Court	1.00	200.00	\$200.00
					Hours	27.90
					Labor:	\$9,147.50
				Invoice	Amount:	\$9,444.78

Total Expenses: \$297.28



Tax ID: 26-0118073

Invoice submitted to:

Invoice # 13579

EXTRACT LABS, INC 1399 Horizon Avenue Lafayette, CO 80026,USA

Invoice Date: 03/01/22 Terms: COD Services Through: 03/01/22

Date	Ву	Туре	Service Summary	Hours/Qty	Rate	Amoun
			Service Summary ATRACT (Professional Services)	Hours/Qty	Rate	Amoun
			<u> </u>	Hours/Qty	Rate 325.00	Amoun \$487.5
In Reference	e To:	TAVAREZ v. EX	TTRACT (Professional Services)			\$487.5
In Reference	e To: VV	TAVAREZ v. EX	Revisions to Motion to Dismiss Review of court order extending deadline for responsive pleading, updated calendar	1.50	325.00	
In Reference 02/02/22 02/02/22	e To: VV VV	TAVAREZ v. EX Draft Review	ATRACT (Professional Services) Revisions to Motion to Dismiss Review of court order extending deadline	1.50 0.10	325.00 325.00	\$487.5 \$32.5

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Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
02/07/22	MJL	Draft	Services in connection with drafting MTD; finalize for filing.	1.30	375.00	\$487.50
02/09/22	VV	Review	Review of local rule regarding response deadline and calendared	0.10	325.00	\$32.50
02/09/22	VV	Draft	Drafting Corporate Disclosure Statement and filing	0.40	325.00	\$130.00
02/18/22	VV	Review	Review of Plaintiff's letter to court and local rule regarding their response and email to client regarding	0.20	325.00	\$65.00
In Reference	e To: 1	ΓAVAREZ v. EXT	FRACT (Expenses)			
02/01/22	VV	Filing Fee	IL - Certificate of Good Standing (actual date 1/6/2022)	1.00	15.00	\$15.00
02/01/22	MJL	Filing Fee	Motion for Pro Hac Vice in NY Southern District Court For Michael Laszlo	1.00	200.00	\$200.00
					Hours	9.40
					Labor:	\$3,120.00
				Invoice	Amount:	\$3,335.00

Total Expenses:



Tax ID: 26-0118073

Invoice submitted to:

Invoice # 13626

EXTRACT LABS, INC 1399 Horizon Avenue Lafayette, CO 80026,USA

Invoice Date: 04/01/22 Terms: COD Services Through: 04/01/22

Date	Ву	Туре	Service Summary	Hours/Qty	Rate	Amount
In Referen	nce To:	TAVAREZ v. EX	XTRACT (Professional Services)			
03/01/2	2 VV	Review	Review of docket/letter from Plaintiff's counsel and practice rules as Plaintiff failed to file timely	0.30	325.00	\$97.50
				Tot	al Hours:	0.30
				To	tal Labor:	\$97.50
				Total Invoice	Amount:	\$97.50



Tax ID: 26-0118073

Invoice submitted to:

Invoice # 13711

EXTRACT LABS, INC 1399 Horizon Avenue Lafayette, CO 80026,USA

Invoice Date: 06/01/22 Terms: COD Services Through: 06/01/22

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
In Referenc	e To:	TAVAREZ v. EXT	RACT (Professional Services)			
05/05/22	VV	Draft	Review of new cases/orders on MTDs in ADA cases and review MTD with notes for new motion, began drafting Memorandum of Law	2.00	325.00	\$650.00
05/05/22	VV	Review	Review of Amended Complaint and local rules and court's standing order regarding responsive pleadings	0.90	325.00	\$292.50
05/06/22	VV	Phone Call	Call with client regarding status of accessible audit, website update and needs for declaration	0.40	325.00	\$130.00
05/06/22	VV	Draft	Revising Declaration of Grant Rogers based upon information from client regarding status/update of website changes	0.60	325.00	\$195.00
05/19/22	VV	Draft	Drafting Motion to Dismiss Amended Complaint	2.00	325.00	\$650.00
05/20/22	VV	Draft	Continued drafting Motion to Dismiss Amended Complaint	0.40	325.00	\$130.00
05/20/22	VV	Draft	Review of SDNY local rules regarding extensions, review of Judge's standing order, and drafting Motion for Extension of Time to file Motion to Dismiss	1.10	325.00	\$357.50

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Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
05/20/22	VV	Correspondence	Received and responded to email from client regarding need to delay call and to follow up next week, email to counsel regarding extension request	0.20	325.00	\$65.00
05/23/22	VV	Review	Review of court order and email to client regarding	0.20	325.00	\$65.00
In Reference	e To:	ΓAVAREZ v. EXTR	ACT (Expenses)			
05/05/22	MJL	Westlaw Legal Research	Westlaw Access	1.00	250.00	\$250.00
					Hours	7.80
					Labor:	\$2,535.00
				Invoice	Amount:	\$2,785.00

Total Expenses: \$250.00



LaszloLaw

2595 Canyon Blvd. Suite 210 Boulder, CO 80302

> Phone: 303-926-0410 Tax ID: 26-0118073

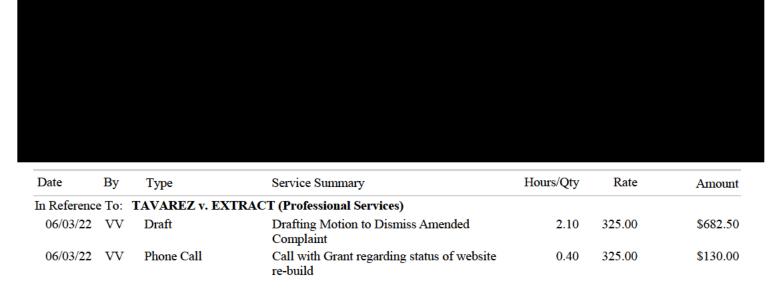
Invoice submitted to:

Invoice # 13755

EXTRACT LABS, INC 1399 Horizon Avenue

Lafayette, CO 80026,USA

Invoice Date: 07/01/22 Terms: COD Services Through: 07/01/22



Case 1:21-cv-09916-JPO Document 32-3 Filed 04/12/23 Page 13 of 20

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
06/06/22	VV	Phone Call	Call with Grant regarding status of website and Declaration	0.20	325.00	\$65.00
06/06/22	VV	Draft	Revising Declaration and Motion to Dismiss Amended Complaint Table of Authorities and Table of Contents, Exhibit 1 and Memorandum	0.90	325.00	\$292.50
06/07/22	VV	Draft	Revise/Finalize Motion to Dismiss Amended Complaint	2.70	325.00	\$877.50
06/07/22	VV	Phone Call	Call with Grant re status of compliance	0.20	325.00	\$65.00
06/07/22	MJL	Review	Review and draft revisions to MTD	1.20	375.00	\$450.00
06/08/22	VV	Draft	Finalizing exhibits and motion and proposed order for filing	0.90	325.00	\$292.50
06/22/22	VV	Review	Review letter motion filed by Plaintiff, updated file	0.10	325.00	\$32.50
06/23/22	VV	Review	Review minute order re deadlines for response/reply and calendar	0.20	325.00	\$65.00
06/29/22	VV	Review	Review of Plaintiff's Response to Motion to Dismiss, notes to file for reply and email to client with notes a	2.00	325.00	\$650.00
06/30/22	VV	Correspondence	Review of emails from client and to Accessibe in response to MTD response	0.20	325.00	\$65.00
					Hours	11.10
					Labor:	\$3,667.50
				Invoice	Amount:	\$3,667.50



LaszloLaw

2595 Canyon Blvd. Suite 210 Boulder, CO 80302

> Phone: 303-926-0410 Tax ID: 26-0118073

Invoice submitted to:

Invoice # 13782

EXTRACT LABS, INC

1399 Horizon Avenue Lafayette, CO 80026,USA Invoice Date: 07/31/22 Terms: COD Services Through: 07/31/22

Date	Ву	Type	Service Summary	Hours/Qty	Rate	Amount
In Referen	ce To:	TAVAREZ v. I	EXTRACT (Professional Services)			
. = ! . = ! = .						
07/05/22	VV	Review	Review of communications from client and from accessiBe regarding options for litigation support and preparation for call with client regarding reply	0.80	325.00	\$260.00

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Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
07/07/22	VV	Draft	Review of cases cited by Plaintiff in Response, notes for reply and continued drafting Reply in support of Motion to Dismiss	5.20	325.00	\$1,690.00
07/08/22	VV	Draft	Drafting Reply in support of Motion to Dismiss	2.60	325.00	\$845.00
07/08/22	VV	Phone Call	Call to client Grant Rogers re status	0.20	325.00	\$65.00
07/08/22	VV	Draft	Compiling data and reports from AccessiBe for drafting of Supplemental Declaration	0.60	325.00	\$195.00
07/11/22	VV	Draft	Drafting Reply to Motion to Dismiss - 12 (b)(6) Argument	1.60	325.00	\$520.00
07/11/22	VV	Draft	Revising Reply and integrating paragraphs of Supplemental Declaration into draft	1.20	325.00	\$390.00
07/11/22	VV	Draft	Preparing exhibits for Reply to Motion to Dismiss	0.30	325.00	\$97.50
07/12/22	MJL	Draft	Services in connection with draft MTD; research re law applicable to MTD.	2.80	375.00	\$1,050.00
07/12/22	VV	Draft	Revisions to Reply to Motion to Dismiss and drafting Table of Authorities and Table of Contents	2.30	325.00	\$747.50
07/12/22	MJL	Draft	Legal research re: MTD / refute Plaintiff's allegations re: screen reader argument. Finalize arguments and draft.	2.10	375.00	\$787.50
07/13/22	VV	Phone Call	Call to client re Supplemental Declaration	0.10	325.00	\$32.50
07/13/22	VV	Draft	Reviewing/revising Reply to Motion to Dismiss, finalizing and filing	1.30	325.00	\$422.50
07/13/22	VV	Draft	Review of signed supplemental declaration and incorporating it as an exhibit	0.20	325.00	\$65.00
In Reference	e To: 1	ΓAVAREZ v. EXTR	ACT (Expenses)			
07/12/22	MJL	Westlaw Legal Research	WL Research	1.00	250.00	\$250.00
					Hours	24.70
					Labor:	\$8,272.50
				Invoice	Amount:	\$8,522.50

Total Expenses:

\$250.00



Tax ID: 26-0118073

Invoice submitted to:

EXTRACT LABS, INC

1399 Horizon Avenue Lafayette, CO 80026,USA

Invoice Date: 11/01/22 Terms: COD Services Through: 10/31/22

Invoice # 13910

n Reference To: TAVAREZ v. 1	EXTRACT (Professional Services)			
10/31/22 VV Review	Review Notice filed by attorney for Tavarez - updated file	0.10	325.00	\$32.50
			Hours	0.10
			Hours Labor:	0.10 \$32.50



Tax ID: 26-0118073

Invoice submitted to:

Invoice # 13993

EXTRACT LABS, INC 1399 Horizon Avenue Lafayette, CO 80026,USA

Invoice Date: 01/01/23 Terms: COD Services Through: 01/01/23

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
In Referenc	e To:	TAVAREZ v. EXTRA	ACT (Professional Services)			
12/21/22	VV	Phone Call	Received call from counsel, returned call	0.10	325.00	\$32.50
12/21/22	VV	Correspondence	Review of 42 USC 12205 re recovery of fees, email to client regarding proposed settlement per call with counsel	0.50	325.00	\$162.50
12/22/22	VV	Correspondence	Email follow up to client regarding settlement	0.10	325.00	\$32.50
12/22/22	VV	Review	Review of recent Tavarez decision, research other cases in Westlaw	0.60	325.00	\$195.00
12/22/22	VV	Phone Call	Preparation for and conducted call with client re settlement strategy	0.30	325.00	\$97.50
12/22/22	VV	Correspondence	Email to Plaintiff's counsel with response to settlement offer	0.20	325.00	\$65.00
12/29/22	VV	Correspondence	Email to counsel for Plaintiff	0.10	325.00	\$32.50
					Hours	1.90
					Labor:	\$617.50
				Invoice	Amount:	\$617.50

Page: 2 of 2



Tax ID: 26-0118073

Invoice submitted to:

EXTRACT LABS, INC 1399 Horizon Avenue Lafayette, CO 80026,USA **Invoice # 14110**

Invoice Date: 04/03/23 Terms: COD Services Through: 04/03/23

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
In Referen	ice To:	TAVAREZ v.	EXTRACT (Professional Services)			
03/31/23	3 VV	Review	Review of Court's Order dismissing case, review of rule re recovery of fees, email to client	0.60	375.00	\$225.00
					Hours	0.60
					Labor:	\$225.00
				Invoice	e Amount:	\$225.00



Tax ID: 26-0118073

Invoice submitted to:

Invoice # 14140

EXTRACT LABS, INC 1399 Horizon Avenue Lafayette, CO 80026,USA

Invoice Date: 04/12/23 Terms: COD Services Through: 04/12/23

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
In Referenc	e To:	TAVAREZ v. EX	TRACT (Professional Services)			
04/05/23	VV	Research	Review statute for deadline to file ADA fee petition, update calendar	0.30	375.00	\$112.50
04/05/23	VV	Draft	Drafting Motion for Attorney Fees, review of Judge practice standards for Mtn for Fees, Review of FRCP 54/42 USC 12205	1.10	375.00	\$412.50
04/06/23	VV	Draft	Drafting Motion for Attorney Fees	3.40	375.00	\$1,275.00
04/07/23	VV	Draft	Drafting Motion for Attorney Fees	2.60	375.00	\$975.00
04/10/23	VV	Draft	Continued Drafting of Motion for Attorney's Fees	2.60	375.00	\$975.00
04/11/23	VV	Draft	Revising Motion for Attorney Fees	0.90	375.00	\$337.50
04/11/23	VV	Draft	Drafting Declaration of Attorney Fees for ML and VV, Table of Authorities and Table of Contents	1.70	375.00	\$637.50

Total Hours: 12.60 Total Labor: \$4,725.00 **Total Invoice Amount:**

\$4,725.00